

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
Charles Mintz	:	CHAPTER 13
Debtor	:	
	:	No. 15-17168-elf

**ANSWER TO MOTION OF NATIONSTAR MORTGAGE, LLC FOR RELIEF FROM
AUTOMATIC STAY**

Debtor, Charles Mintz, by and through the undersigned counsel, does hereby file the instant Response to Motion for Relief from Automatic Stay filed by Nationstar Mortgage, LLC d/k/a Champion Mortgage Company and in support thereof responds as follows:

1-2. Admitted.

3-7. Denied. Averments 3 through 5 contain legal conclusions, to which the applicable rules of civil procedure do not require a responsive pleading, and the same is therefore denied. Strict proof is demanded at time of hearing, if relevant.

8. Admitted.

9-10. Denied. Averments 9 and 10 contain legal conclusions, to which the applicable rules of civil procedure do not require a responsive pleading, and the same is therefore denied. Strict proof is demanded at time of hearing, if relevant. By way of further response, and upon information and belief, the property tax amount alleged by Movant is inaccurate. See Exhibit "A" for a true and correct copy of the Delaware County Online Property Tax Assessment for 1000 Longacre Blvd, Yeadon, PA, retrieved September 13, 2019. Exhibit "A" is attached, marked, and incorporated by reference as though set forth in full herein.

11. Admitted.

12-16. Averments 12 through 16 contain legal conclusions, to which the applicable rules of civil procedure do not require a responsive pleading, and the same is therefore denied. Strict proof is demanded at time of hearing, if relevant.

WHEREFORE, Debtor, Charles Mintz, does hereby request that this honorable Court deny Movant's Motion for Relief from Automatic Stay with prejudice.

Date: 9/16/19

Respectfully submitted.

/S/ Erik B. Jensen
Erik B. Jensen, Esq.

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:	:	
Charles Mintz	:	CHAPTER 13
Debtor	:	
	:	No. 15-17168-elf

CERTIFICATE OF SERVICE

I, Erik B. Jensen, esquire do hereby certify that a true and correct copy of the Debtor's Response to Motion for Relief was served upon the Chapter 13 Standing Trustee, William C. Miller, Esquire and Lauren Karl, Esquire via electronic mail on September 16, 2019.

Date:9/16/19

Respectfully submitted.

/S/ Erik B. Jensen
Erik B. Jensen, Esq.